

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

CUSTOMS AND TAX ADMINISTRATION OF  
THE KINGDOM OF DENMARK  
(SKATTEFORVALTNINGEN) TAX REFUND  
SCHEME LITIGATION

This document relates to 1:18-CV-05053-LAK.

MASTER DOCKET

Case No. 1:18-MD-02865-LAK

**NOTICE OF THE GOLDSTEIN LAW GROUP PC 401(K) PROFIT SHARING  
PLAN'S, SHELDON GOLDSTEIN'S, AND SCOTT GOLDSTEIN'S  
MOTION TO DISMISS AMENDED COMPLAINT**

**PLEASE TAKE NOTICE** that, upon the accompanying July 3, 2020 Memorandum of Law and July 3, 2020 Declaration of Kari Parks with all exhibits thereto, Defendants The Goldstein Law Group PC 401(K) Profit Sharing Plan, Sheldon Goldstein, and Scott Goldstein (together, the “**Goldstein Parties**”), by their undersigned attorneys, will move the Court before the Honorable Lewis A. Kaplan at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, Courtroom 21B, at a date and time to be determined by the Court, for an order dismissing Plaintiff Skatteforvaltningen's Amended Counterclaim pursuant to Federal Rule of Civil Procedure 12(b)(6), and for such other and further relief as the Court deems just and proper.

The Goldstein Parties respectfully request that the Court hold oral argument on this motion.

Dated: July 3, 2020  
New York, New York

GUSRAE KAPLAN NUSBAUM PLLC

By: /s/ Martin H. Kaplan

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